UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

IRMA GOLDEN,

Plaintiff,

Case No. 2:17-cv-13018

VS.

HON. LAURIE J. MICHELSON

UAW-CHRYSLER NATIONAL TRAINING CENTER,

Defendant.

Mary Anne M. Helveston (P37653) HELVESTON & HELVESTON PC Attorneys for Plaintiff 65 Cadillac Square, Suite 2915 Detroit, MI 48226-2880 (313) 963-7220 John M. Lichtenberg (P31770) Catherine A. Brainerd (P70202) RHOADES McKEE PC Attorneys for Defendant 55 Campau Avenue, N.W., Suite 300 Grand Rapids, Michigan 49503 (616) 235-3500

DEFENDANT'S WITNESS LIST

Defendant, UAW-Chrysler National Training Center, through its attorneys, Rhoades McKee, PC, and pursuant to this Court's Case Management Requirements and Scheduling Order, identify the following witnesses who may testify in this matter:

- 1. The following individuals are employees or former employees of Defendant, with an address of 2500 E Nine Mile Rd., Warren, MI 48091. They may be contacted through legal counsel for Defendants.
 - a. Tammy Wilson
 - b. Miguel Foster
 - c. Tom Rolands

- d. Al Jones
- e. Decoris Glenn
- f. James Davis
- 2. Norwood Jewell –Mr. Jewell's contact information is not available at this time.
- 3. Delrico Lloyd –Mr. Lloyd's work address is 2500 E Nine Mile Rd., Warren, MI 48091, and his telephone number is 586-427-4334.
- 4. Helen Scott –Ms. Scott's work address is 2500 E Nine Mile Rd., Warren, MI 48091, and her telephone number is 586-427-4031.
- 5. Michele Adams –Ms. Adams work address is 2500 E Nine Mile Rd., Warren, MI 48091, and her telephone number is 586-427-6526.
- 6. Theresa Brown Ms. Brown currently works at the Sterling Heights Assembly Plant, work address is 38111 Van Dyke Ave., Sterling Heights, MI 48312, and her telephone number is 313-663-2345.
- 7. Any and all witnesses listed or disclosed by Plaintiff.
- 8. Any and all witnesses known to Plaintiff which are yet undisclosed to Defendant.
- 9. Any and all witnesses identified in response to Interrogatories and/or Requests for Production of Documents.
- 10. Any and all witnesses named during depositions.
- 11. Defendant reserves the right to call rebuttal and foundation witnesses as necessary.
- 12. Defendant reserves the right to amend this disclosure as witnesses become known throughout the course of discovery.

Respectfully submitted,

Rhoades McKee PC

Attorneys for Defendant

Date: April 13, 2018

By: /s/ Catherine A. Brainerd
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